

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING)
(UPS PROPOSALS ONE, TWO AND THREE)) Docket No. RM2016-2

**MOTION OF AMAZON FULFILLMENT SERVICES, INC.,
FOR ISSUANCE OF CHAIRMAN'S INFORMATION REQUEST**

Pursuant to 39 C.F.R. § 3007.21(a), Amazon Fulfillment Services, Inc. ("Amazon" or "AFSI") respectfully requests that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion. The proposed question follow up certain of the December 10 responses of UPS to Chairman's Information Request No. 1. AFSI requests that the Presiding Officer require that (1) the requested information be produced publicly; (2) information generated by spreadsheets should be produced in Excel or other spreadsheet files; and (3) and any formulas embedded in the spreadsheets should be preserved.

Respectfully submitted,

/s/

David M. Levy
Robert P. Davis
VENABLE LLP
575 7th Street, N.W.
Washington, DC 20004
(202) 344-4732

Counsel for Amazon Fulfillment Services, Inc.

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PROPOSED QUESTIONS

1. This question refers to the figure entitled “Y/Y Change in Market Share for Priority Mail/Ground Volume” on page 14 of the UPS response to Chairman’s Information Request No. 1.
 - a. Please provide the UPS, FedEx, and USPS market shares that were inputs to this figure. Please include market share data for every quarter from 3Q2013 to 4Q2015.
 - b. Please provide exact citations to all data that were used as inputs to developing the numbers in the figure.
 - c. Please provide all calculations used to derive the numbers in this figure in a cited, electronic spreadsheet format.
 - d. Please confirm that the market shares shown in the figure are shares of volume and that the Postal Service’s share of revenue is smaller than its share of volume. If not confirmed, please explain fully.
 - e. Please confirm that both UPS and FedEx increased their use of dimensional weight pricing on or about the beginning of Calendar Year 2015. If not confirmed, please explain fully. If confirmed, please explain in detail the extent to which dimensional weight pricing was expanded on or about the beginning of Calendar Year 2015 and the date (or range of dates) on which this expansion occurred.

- f. Please explain fully the effect of the increase in the use of dimensional weight pricing by UPS and FedEx on their market shares in the Priority Mail/Ground market and in the commercial Priority Mail/Ground market.¹
2. Please refer to the figure entitled “Commercial (IBI/PI) Priority Mail Volume Growth vs UPS/FedEx Ground (Y/Y)” on page 15 of the UPS response to Chairman’s Information Request No. 1.
 - a. Please provide the UPS Ground, FedEx Ground, and USPS market shares that were inputs to this figure. Please include market share data for every quarter from 3Q2013 to 4Q2015.
 - b. Please provide exact citations to all data that were used as inputs to numbers in the figure.
 - c. Please provide all calculations used to derive the numbers in the figure in a cited, electronic spreadsheet format.
 - d. Has UPS performed any analysis of the extent to which the increase in Commercial (IBI/PI) Priority Mail Volume reflects migration from non-Commercial (non-IBI/PI) Priority Mail Volume or any other Postal Service product? If so, please provide all analysis in its entirety.

¹ If UPS regards the information responsive to Question 1.f as commercially sensitive, AFSI will consent the submission of the information under seal pursuant to the existing protective conditions in this case.

3. Please refer to Table 1 on page 22 of your response to Chairman's Information Request No. 1. Please explain fully why proposal one is estimated to have no effect whatsoever on the cost of several products. Please explain individually for each product that UPS has estimated would be unaffected by proposal one.
4. Please refer to Table 2 on page 41 of your response to Chairman's Information Request No. 1. Please explain fully why proposal two is estimated to have no effect whatsoever on the cost of several products. Please explain individually for each product that UPS has estimated would be unaffected by proposal one.